

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE:	§	CASE NO. 14-31345
	§	
JAGGER INDUSTRIES, LLC	§	
	§	CHAPTER 7
Debtor.	§	

**NOTICE OF INTENTION TO ABANDON PROPERTY OF THE ESTATE  
(RECORDS STORED AT OFFICES OF SPECIAL LITIGATION COUNSEL)**

TO ALL CREDITORS, PARTIES IN INTEREST, INDENTURE TRUSTEES AND COMMITTEES APPOINTED OR ELECTED IN THIS CASE PURSUANT TO LAW:

**THIS NOTICE SEEKS RELIEF THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE ABANDONMENT, YOU SHOULD IMMEDIATELY CONTACT THE TRUSTEE'S COUNSEL TO RESOLVE THE DISPUTE. IF YOU AND THE TRUSTEE CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE TRUSTEE. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 14 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE ABANDONMENT SHOULD NOT BE ALLOWED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE ABANDONMENT MAY BE ALLOWED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE ABANDONMENT AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE ABANDONMENT AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

In accordance with Bankruptcy Rule 6007 and pursuant to 11 U.S.C. §554, notice is hereby given that Janet S. Northrup, Trustee of the above referenced bankruptcy estate, intends to and will abandon all records obtained by, provided to, or produced by Carrigan McCloskey & Roberson L.L.P. ("Special Counsel") and currently stored by Special Counsel at 945 Heights Blvd, Houston, TX 77008, including but not limited to the following:

1. Debtor records produced in connection with the concluded state court case of Cause No. 413338-401, *Estate of Jason Andrew Gehrig v. Prologic Management Systems, Inc.*, et al., pending the Probate Court No. 1, Harris County, Texas (the "State Court Litigation"). The Trustee is currently maintaining electronic copies of the production until this bankruptcy case is concluded, at which time the electronic copies may also be destroyed.

The State Court Litigation is concluded. Based on her investigation, it is the Trustee's opinion that the records are now of inconsequential value and benefit to the estate or are burdensome to the estate, and therefore should be abandoned. Unless an objection and request for hearing is timely filed with the Bankruptcy Court and served upon the Trustee within fourteen (14) days of the mailing of this notice, these records shall be deemed abandoned without an order or further notice.

Respectfully submitted,

HUGHES, WATTERS & ASKANASE, L.L.P.

/s/ Rhonda R. Chandler

Rhonda R. Chandler

State Bar No. 04010600

Hughes, Watters & Askanase, L.L.P.

333 Clay, Suite 2900

Houston, Texas 77002

713/759-0818 Phone

713/759-6834 Fax

ATTORNEYS FOR TRUSTEE

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing *Notice of Intention to Abandon Property of the Estate (Records Stored at Offices of Special Litigation Counsel)* has been served on those parties shown on the attached Service List via electronic notice and/or first class U.S. mail, postage prepaid on this the 5<sup>th</sup> day of February, 2016.

/s/ Rhonda R. Chandler

Rhonda R. Chandler

**SERVICE LIST**

**Debtor**

\*Jagger Industries, LLC  
9400 Needlepoint Rd.  
Baytown, TX 77521-9390

**Debtor's Counsel**

Kimberly Anne Bartley  
Waldron & Schneider, L.L.P.  
15150 Middlebrook Drive  
Houston, TX 77058-1227

**Chapter 7 Trustee**

Janet S. Northrup  
Hughes Watters and Askanase  
333 Clay, 29th Floor  
Houston, TX 77002-2571

**U.S. Trustee**

Hector Duran  
Office of the US Trustee  
515 Rusk Ave, Ste 3516  
Houston, TX 77002-2604

**Creditors**

A-Affordable Vacuum Service  
P.O. Box 300011  
Houston, TX 77230-0011

Allometrics, Inc.  
2500 Bayport Blvd.  
Seabrook, TX 77586-2405

AmSpec, LLC  
1249 South River Road  
Cranbury, NJ 08512-3633

AmSpec, LLC  
c/o Cody Moorese  
Shelton Harrison et al  
701 Highlander Blvd., # 270  
Arlington, TX 76015-4600

Anthony Rivon All Control  
810 Hamilton  
P.O. Box 1173  
Anahuac, TX 77514-1173

BC Goodwin Transportation, LLC  
P.O. Box 3238  
Salt Lake City, UT 84110-3238

BakerCorp  
101 Old Underwood Rd., Bldg. B  
LaPorte, TX 77571-9480

Bakercorp  
P.O. Box 843596  
Los Angeles, CA 90084-3596

Blue Cross of Texas  
P.O. Box 731428  
Dallas, TX 75373-1428

Brenner Tank Services  
2840 Appelt Dr.  
Houston, TX 77015-6554

Bullseye Welding & Industrial Supply LLC  
P.O. Box 2109  
Baytown, TX 77522-2109

Larry Caldwell  
4544 Post Oak Place, Ste 123  
Houston, TX 77027-3111

Carnes Engineering, Inc  
P.O. Box 668  
Mont Belvieu, TX 77580-0668

Channel Biorefinery & Terminals, LLC  
13605 Industrial Rd  
Houston, TX 77015-6818  
Chemtrec AR  
P.O. Box 791383  
Baltimore, MD 21279-1383

Cintas FAS Lockbox  
P.O. Box 636525  
Cincinnati, OH 45263-6625

Coastal Welding Supply  
P.O. Box 3029  
Beaumont, TX 77704-3029

Cokinos Energy Corporation  
Department 456  
P.O. Box 4869  
Houston, TX 77210-4869

Commercial Fence Company  
d/b/a Commercial Access Controls  
P.O. Box 1354  
Pasadena, TX 77501-1354

Michael M. Essmyer, Sr.  
Essmyer & Daniel, PC  
5111 Center Street  
Houston, TX 77007-3305

Fisher & Associates  
55 Waugh Drive, Suite 603  
Houston, TX 77007

G Tech-HilTech  
P.O. Box 2787  
Conroe, TX 77305-2787

Green Energy Advisors Group LLC  
919 Orange Ave, Ste 202  
Winter Park, FL 32789-4764

GreenHunter Biofuels, Inc  
In Receivership  
c/o Diana E Marshall PLLC  
1010 Lamar, Ste 450  
Houston, TX 77002-6322

Guardian Life Insurance Company  
P.O. Box 824404  
Philadelphia, PA 19182-4404

Gulf West Landfill TX LP  
P.O. Box 841833  
Dallas, TX 75284-1833

H&H Oil-Austin  
1331 Gemini, Ste 250  
Houston, TX 77058-2764

Harris County TX  
c/o Jennifer Matte Asst Cty Atty  
1019 Congress, 15th Floor  
Houston, TX 77002-1799

Harris County Tax Assessor  
Mike Sullivan  
P.O. Box 4663  
Houston, TX 77210-4663

Harris-Galveston Subsidence District  
1660 West Bay Area Blvd.  
Friendswood, TX 77546-2640

Hertz Equipment Rental Corp  
Service Pump Division  
P.O. Box 650280  
Dallas, TX 75265-0280

Hoover Slovacek, LLP  
P.O. Box 4547  
Houston, TX 77210-4547

Internal Revenue Service  
Centralized Insolvency Operations  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Innovative Resources Management  
125 Crosscreek Dr.  
Summerville, SC 29485-8250

J&B Pipeline Supply Company  
12921 N Alexander Dr  
P.O. Box 1814  
Baytown, TX 77522-1814

JAM Distributing Co  
P.O. Box 201978  
Dallas, TX 75320-1978

Jacobson Transportation Company, Inc.  
P.O. Box 224  
Des Moines, IA 50306-0224

Larson King  
2800 Wells Fargo Place  
30 E 7th St  
Saint Paul, MN 55101-4922

\*LAAP, Inc.  
P.O. Box 1437  
Magnolia, TX 77353-1437

Liquid Environmental Solutions  
P.O. Box 203371  
Dallas, TX 75230-3371

Miller Transporters, Inc.  
P.O. Box 1123  
Jackson, MS 39215-1123

PBL - Premier Bulk Logistics  
c/o Scanlan, Buckle & Young PC  
602 West 11st St  
Austin, TX 78701-2007

Pacific Business Capital Corp  
245 Fischer Ave, Ste A-1  
Costa Mesa, CA 92626-4553

Petroleum Materials LLC  
30603 Tealcrest Estates Dr  
Spring, TX 77386-2740

Processing Equipment & Technologies,  
LLC  
c/o Ron Sommers  
2800 Post Oak Blvd., 61st Floor  
Houston, TX 77056-6131

Prologic Technology Group  
4633 E Broadway Blvd., Ste 150  
Tuscon, AZ 85711-3511

Reliable Office Supplies  
P.O. Box 105529  
Atlanta, GA 30348-5529

SMB Technology Consulting, LLC  
17515 Spring Cypress Rd., #C219  
Cypress, TX 77429-2688

Sage Environmental Consulting  
P.O. Box 1883  
San Antonio, TX 78297-1883

Shellist Lazarz Clobin, LLP  
11 Greenway Plaza, Ste 1515  
Houston, TX 77046-1108

Southwest Spectro-Chem Labs  
1009 Louisiana Ave  
South Houston, TX 77587-3126

Sunbelt Rentals  
P.O. Box 409211  
Atlanta, GA 30384-9211

Pete Tamez  
265 W Unon St.  
Benson, AZ 85602-6872

Texas Comm on Environmental Quality  
P.O. Box 13089  
Austin, TX 78711-3089

Trinity Industries Leasing Co  
W 510131  
P.O. Box 7777  
Philadelphia, PA 19175-0131

Trinity Industries Leasing Corporation  
2525 Stemmons Freeway  
Dallas, TX 75207-2401

Triple D Uniform Rental  
4031 Southerland Rd  
Houston, TX 77092-4414

United Rentals  
7840 Highway 146 S  
Baytown, TX 77523-7617

\*Verizon Business  
P.O. Box 371355  
Pittsburgh, PA 15250-7355

Vista Technology Partners Inc.  
4633 E. Broadway Blvd.  
Tuscon, AZ 85711-3511

Waste Management  
P.O. Box 660345  
Dallas, TX 75266-0345

Weaver & Tidwell LLP  
24 Greenway Plaza, Ste 1800  
Houston, TX 77046-2457

Parties Requesting Notice  
CIMA Services, LP  
c/o Kenneth M. Krock  
Megan N. Brown  
Rapp & Krock, PC  
3050 Post Oak Blvd, Suite 1425  
Houston, TX 77056

Pacific Business Capital Corporation  
c/o Bruce B. Osterstrom  
245 Fischer Avenue, Suite A-1  
Costa Mesa, CA 92616

Mary Ann Kilgore  
Jeannie L. Anderson  
Union Pacific Railroad Company  
1400 Douglass Street, STOP 1580  
Omaha, Nebraska 68179

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P.O. Box 16276  
Sugar Land, TX 77496-6276

Joseph Kots  
Commonwealth of Pennsylvania  
Department of Labor and Industry  
Reading Bankruptcy & Compliance Unit  
625 Cherry Street, Room 203  
Reading, PA 19602-1152